

**UNITED STATES OF AMERICA  
BEFORE THE NATIONAL LABOR RELATIONS BOARD  
WASHINGTON, D.C.**

**VERITAS HEALTH SERVICES, INC.  
d/b/a CHINO VALLEY MEDICAL  
CENTER,**

**Respondent,**

**v.**

**UNITED NURSES ASSOCIATIONS OF  
CALIFORNIA/UNION OF HEALTH  
CARE PROFESSIONALS, NUHHCE,  
AFSCME, AFL-CIO,**

**Charging Party.**

**Case No. 31-CA-30105**

**DECLARATION OF THEODORE R. SCOTT IN SUPPORT OF RESPONSE TO  
NOTICE TO SHOW CAUSE**

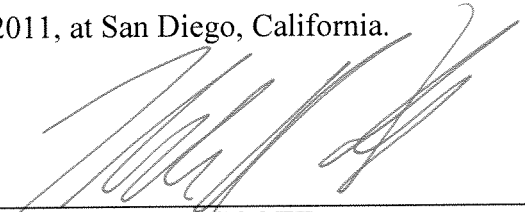
I, THEODORE R. SCOTT, hereby declare as follows:

1.     Identification. I am an attorney at law duly licensed to practice law by the state bars of California and Arizona and have also been admitted to practice before numerous U.S. District Courts, Courts of Appeal and the United States Supreme Court. I am a shareholder in the law firm of Littler Mendelson, a Professional Corporation, attorney of record for VERITAS HEALTH SERVICES, INC. dba CHINO VALLEY MEDICAL CENTER in the above-captioned matter and have been involved in representing the Respondent in proceedings relating to Case 31-RC-8795, the Charging Party Union's demand for information and to bargain made in April 2010, the Employer's response thereto, and various other matters involving the Union's efforts to organize the RNs employed by Respondent. I am also familiar with Kathy Sackman and have had a number of communications with her over the years. I have personal knowledge of the facts set forth herein and if called as a witness I could and would competently testify thereto and authenticate all documents referenced in this declaration.

2. Demand for Bargaining and Employer Response. Attached to this Declaration as Exhibit 1 is a true and correct copy of an April 9, 2010 letter from the Union to the Employer. Attached hereto as Exhibit 2 is a true and correct copy of the Employer's April 14, 2010 response.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 22nd day of March, 2011, at San Diego, California.



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THEODORE R. SCOTT